| UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS |                        | FILED<br>M CLERKS OFFICE                 |
|--|------------------------|--|
| UNITED STATES OF AMERICA                               | ,                      | - 2005 FEB 15 A II: 12                   |
| vs.  | )<br>)NO. 04-10214 GAO | U.S. DISTRICT COURT<br>DISTRICT OF MASS. |
| MOHAMAD M. HAMADE                                      | )                      |  |

## DEFENDANT'S MOTION TO CONTINUE STATUS CONFERENCE

Now comes the defendant by and through counsel and moves this Honorable Court for an order continuing the status conference scheduled for Thursday, February 17, 2006 at 3:30 p.m. to March 18, 2005 and as his basis, therefore, asserts the following:

Counsel for defendant is presently engaged in trial before Judge Ponsor in United States v. Phillips et al, docket No. 3:03cr-30018 MAP which will continue until at least February 20, 2005. Counsel for defendant also has scheduled for Thursday, February 17, 2006 at 2:30 p.m. a hearing in United States v. Verducci, docket No. 92-30009-F before Judge Ponsor in Springfield.

Assistant United States Attorney, Kimberly West advised counsel for defendant as of the second week of January, 2006 the discovery defendant has requested which is the subject of an IMLAT request remains unavailable.

Counsel has conferred with Assistant United States Attorney, Greg Moffat, who expresses no opposition to the allowance of this motion.

WHEREFORE, counsel for defendant requests the present status conference be rescheduled to a date convenient to the Court and all counsel on or after March 18, 2005.

THE DEFENDANT

Vincent A. Bongiorni, Esq. 95 State Street, Ste 309

Springfield, MA. 01103

(413) 732-0222 BBO #049040

## CERTIFICATE OF SERVICE

I, Vincent A. Bongiorni, Esq., do hereby certify that I have served a copy of the foregoing to the Assistant United States Attorney, Greg Moffat, Esq., John Joseph Moakley United States Courthouse, One Courthouse Way, Ste 9200, Boston, MA. 02210 this JULE day of February, 2005.

Vincent A. Bongiorni